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Bonnie M. Weir
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VIA ECF
May 18, 2011

Hon. Madeline Cox Arleo, U.S.M.J.
M.L. King, Jr. Federal Building
& U.S. Courthouse
50 Walnut Street, Room 2060
Newark, New Jersey 07101

Re: Chaaban, et al v. Criscito
Civil Action No. 08-1567 (GEB/MCA)

Dear Judge Arleo:

This office represents the Defendant with respect to post-judgment discovery and collection. I am in receipt of Mr. Agnello's proposed form of Post-Judgment Discovery Order and I disagree with paragraph "3" therein. My recollection and notes from the telephone conference conducted on May 17, 2011 is that the deposition of the Defendant is to be conducted on Friday, May 27, 2011 **only** if I am not on trial that day. If, however, the trial continues on May 27th, Your Honor instructed that the deposition is to be conducted within the first day or so after my state-court trial is concluded. A proposed form of Order is submitted for Your Honor's consideration reflecting the modified language in paragraph "3".

Thank You for Your time and attention to this matter.

Respectfully submitted:

THE WEIR LAW FIRM, LLC

By: /s/ Bonnie M. Weir
Bonnie M. Weir

Cc: John M. Agnello, Esq. (Via ECF)
R. Bruce Crelin, Esq. (Via ECF)